

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation**

**Master File No. 1:00 – 1898  
MDL 1358 (SAS)**

**This document relates to:**

*Commonwealth of Pennsylvania v. Exxon Mobil  
Corporation, et al., Case No. 14-cv-06228*

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**AFFIDAVIT OF DANIEL J. DUGAN**

COMMONWEALTH OF PENNSYLVANIA :  
: SS  
COUNTY OF PHILADELPHIA :

I, Daniel J. Dugan, Esquire, being of full age, upon my oath do hereby swear as follows:

1. I submit this Affidavit in support of my application for admission Pro Hac Vice in the above-captioned action on behalf of Defendant, American Refining Group, Inc.

2. I am a member in good standing of the highest court of the Commonwealth of Pennsylvania, District of Columbia, Commonwealth of Virginia, and the States of North Carolina, Ohio, and New Jersey. I am also a member in good standing of the United States Supreme Court, United States District Court for the Eastern and Middle Districts of Pennsylvania, the Court of Appeals for the Third Circuit, U.S. Court of Appeals Fourth Circuit, U.S. Court of Appeals Fifth Circuit, U.S. Court of Appeals Ninth Circuit, U.S. Court of Appeals Tenth Circuit, U.S. Court of Appeals and District of Columbia Circuit Court. Copies of my certificates of good standing in Pennsylvania, District of Columbia, Virginia, North Carolina,

Ohio, and State of New Jersey are attached hereto as Exhibit "A."

3. That there are no disciplinary complaints pending against me for violation of the rules in any of the aforementioned Courts.

4. No disciplinary proceedings or criminal charges of any kind have ever been instituted against me in any state in which I practice or have been licensed.

5. If the Court grants my Admission Pro Hac Vice in the above-captioned matter, with reference to all matters, incidents or proceedings, I agree that I will be subject to the orders and be amenable to disciplinary action in a civil jurisdiction of the Court in all respects as if I were regularly admitted and a licensed member of the Bar of this Court in good standing.

6. I have not been suspended or disbarred for disciplinary reasons from practice in any Court.

7. I am a member of the law firm Spector Gadon Rosen Vinci P.C.

8. I do not practice or hold out to practice law in the United States District Court for the Southern District of New York.

9. I am the Managing Member of Spector Gadon Rosen Vinci P.C., I am currently overseeing handline this matter involving American Refining Group, Inc. I concentrate my practice in complex commercial litigation of all types and Defendant American Refining Group, Inc. would substantially benefit from my admission *pro hac vice* in this case.

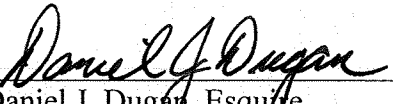
10. Counsel of record, with whom I will be working on this matter, is Bruce W. Bellingham, who is with my law firm, Spector Gadon Rosen Vinci P.C. I understand all notices, orders and pleadings in this matter will be served on Mr. Bellingham.

11. I will immediately notify the Court of any matter affecting my standing at the bar of any other court.

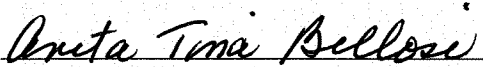
12. I will abide by all rules governing this Court, including disciplinary rules.

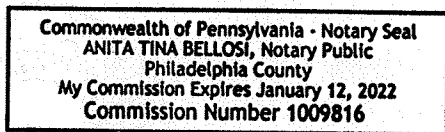
13. I certify that the foregoing statements made by me are true and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

November 19, 2021

  
Daniel J. Dugan, Esquire  
Spector Gadon Rosen Vinci P.C.  
1635 Market Street – 7<sup>th</sup> Floor  
Philadelphia, Pa 19103  
Phone: 215.241.8840  
Fax: 215)241.8844.  
e-mail: [ddugan@sgrvlaw.com](mailto:ddugan@sgrvlaw.com)

Sworn to and subscribed before me  
this 19<sup>th</sup> day of November, 2021

  
Notary Public



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**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2021, a copy of the foregoing document was served electronically on all counsel of record in accordance with the Federal Rules of Civil Procedure.

**SPECTOR GADON ROSEN VINCI P.C.**

/s/Daniel J Dugan

Daniel J. Dugan, Esquire